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# TWO MINUTE TRAINING

TO: CH2M HILL PLATEAU REMEDIATION COMPANY

**FROM:** PAUL W. MARTIN, RCRA Subject Matter Expert

CHPRC Environmental Protection, Hanford, WA

**SUBJECT:** RCRA EMPTY CONTAINERS VS. TSCA PCB DECONTAMINATED CONTAINERS - SCENARIO II

**DATE:** AUGUST 11, 2016

CHPRC Projects	CH PRC - Env.	<u>MSA</u>	<b>Hanford Laboratories</b>	Other Hanford	Other Hanford
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				Tom Moon	
				Chuck Mulkey	
				Mandy Pascual	
				Kirk Peterson	
				Jean Quigley	

## **SUBJECT:** RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario II

- Q: Last week's "Two Minute Training" discussed requirements for rendering reusable, a drained 55-gallon waste container that had contained a material regulated as a RCRA "F" listed non-acutely hazardous waste, and also as a TSCA PCB-contaminated waste (PCB concentration ≥50 ppm and <500 ppm). What if the drained container had contained a material regulated as a RCRA "P" listed acutely hazardous waste, and also as a TSCA PCB waste (PCB concentration ≥ 500 ppm)? Again, the customer does not want to be concerned with "carry through" of any previous RCRA waste codes or PCB contamination to the subsequent waste streams. What must the customer do to render this container reusable per RCRA and TSCA requirements?
- **A:** In terms of RCRA, the customer must render the container RCRA empty for an acutely hazardous waste. Per <u>WAC 173-303-160(2)(b) [40 CFR 261.7]</u> the container can be rinsed at least three times with an appropriate cleaner or solvent. The volume of solvent used for each rinsing must be 10% or more of the container's capacity or of sufficient quantity to thoroughly decontaminate the container.

In terms of TSCA, the customer must decontaminate the container for PCBs. Per  $\frac{40 \text{ CFR}}{761.79}$ (c)(1) the container must be triple rinsed with an appropriate solvent, as defined in 761.79(d)(1) - (3). Each rinse volume must equal approximately 10% of the PCB container's capacity. Once these criteria are achieved for a PCB container, the container can be used or reused as authorized at  $\frac{40 \text{ CFR}}{761.30}$ (u). [Note that the decontamination requirements are the same regardless of PCB concentration ( $\geq$ 50 to <500 or  $\geq$ 500), and very similar to the emptying requirements for a RCRA acutely hazardous waste.]

Since the customer's container had contained a RCRA "P" listed acutely hazardous waste, and a TSCA PCB waste, the customer must meet both the RCRA and TSCA requirements concerning rendering a container RCRA empty and PCB decontaminated. In this case, when the container is triple rinsed with appropriate types and volumes of solvents, the container would be reusable.

### **SUMMARY:**

- A RCRA acutely hazardous waste container can be RCRA emptied when triple rinsed with an appropriate cleaner or solvent and each rinse equals 10% of the container's capacity or is of sufficient quantity to thoroughly decontaminate the container.
- A TSCA PCB container is TSCA decontaminated when triple rinsed with an appropriate solvent and each rinse equals approximately 10% of the container's capacity.
- A RCRA/TSCA container meeting both criteria is no longer subject to RCRA or TSCA regulation and is therefore suitable for reuse.

Excerpts from WAC 173-303-160 and 40 CFR 761 are attached to the e-mail. If you have any questions, please contact me at <a href="mailto:Paul\_W\_Martin@rl.gov">Paul\_W\_Martin@rl.gov</a> or at (509) 376-6620.

FROM: Paul W. Martin DATE: 8/11/16 FILE: c:\...\2MT\2016\081116.rtf PG: 1

### TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario II

#### **WAC 173-303-160** Containers.

- (2) A container or inner liner is "empty" when:
  - (a) All wastes in it have been taken out that can be removed using practices commonly employed to remove materials from that type of container or inner liner (for example, pouring, pumping, aspirating, etc.) and:
    - (i) No more than one inch of waste remains at the bottom of the container or inner liner; or
    - (ii) No more than 3 percent by weight of the total capacity of the container remains in the container or inner liner if the container is less than or equal to 119 gallons in size; or
    - (iii) No more than 0.3 percent by weight of the total capacity of the container remains in the container or inner liner if the container is greater than 119 gallons in size.

(3)

(a) Any residues remaining in containers or inner liners that are "empty" as described in subsection (2) of this section will not be subject to the requirements of this chapter, and will not be considered as accumulated wastes for the purposes of calculating waste quantities.

### 40 CFR 761.79 Decontamination standards and procedures.

- (a) *Applicability*. This section establishes decontamination standards and procedures for removing PCBs, which are regulated for disposal, from water, organic liquids, non-porous surfaces (including scrap metal from disassembled electrical equipment), concrete, and non-porous surfaces covered with a porous surface, such as paint or coating on metal.
  - (3) Materials from which PCBs have been removed by decontamination in accordance with this section may be used or reused in accordance with §761.30(u).
- (c) *Self-implementing decontamination procedures*. The following self-implementing decontamination procedures are available as an alternative to the measurement-based decontamination methods specified in paragraph (b) of this section. Any person performing self-implementing decontamination must comply with one of the following procedures.
  - (1) Any person decontaminating a PCB Container must do so by flushing the internal surfaces of the container three times with a solvent containing <50 ppm PCBs. Each rinse shall use a volume of the flushing solvent equal to approximately 10 percent of the PCB Container capacity.

#### 40 CFR 761.30 Authorizations.

- (u) Use of decontaminated materials.
  - (1) Any person may use equipment, structures, other non-liquid or liquid materials that were contaminated with PCBs during manufacture, use, servicing, or because of spills from, or proximity to, PCBs ≥50 ppm, including those not otherwise authorized for use under this part, provided:
    - (i) The materials were decontaminated in accordance with:
      - (B) Section 761.79; or...

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